

Ivan G. Mc Kinney #60132/
New Jersey State Prison
P.O. Box 861
Trenton, N.J. 08625

United States District Court
Attn. Clerk's Office
50 Walnut Street
Newark, N.J. 07101

11-24-17
McKinney v. Cucchiella et al.
2:15-cv-07442
U.S. District Court
District of New Jersey
RECEIVED
NOV 29 2017

Dear Clerk:

I was ordered by the Hon. Judge Hammer, to ~~to~~ submit my rule 26 disclosures and interrogatory answers by 11-27-17. Please be advised on this 24th day of November 2017 I am handing this to the 1st Shift Officer. As per Houston v. Lack and the prisoner's mailbox rule it is considered filed. I am re-submitting these documents like I did almost a year ago. Because, of my many issues with legal mail here, I believe this Court, and defense counsel did not receive such. Clerk, please electronically send Leonard Seaman ESQ, Hon. Judge Hammer a copy of these documents. I can't chance them not reaching their destination again. Thank you so much for your help. And I'm enclosing a letter asking Judge Hammer to allow me the other 10 document request to be answered.

Sincerely yours,
Ivan Mc Kinney

CC: Leonard Seaman ESQ.
Hon. Judge Hammer

Ivan G. McKinney #601321
NJSP

P.O. Box 861

Trenton, N.J. 08625

U.S. District Court

New Jersey District

Attn. Hon. Judge Michael Hammer

50 Walnut Street

Newark, NJ 07101

11-24-17

McKinney v. Cuccinelli
etal
2:15-cv-07442

Dear Hon. Judge Hammer:

In my 10-29-17 request for documents and discovery, I sought in good Faith. None of my request was to harass, threaten, defame, or waste this court's, nor defendant's time. I meticulously chose these 35 questions to show intent, motive, Reason, accountability, responsible culprit and etc.. These are the best questions for me to effectively prosecute this case. I am asking that you would order defendant's counsel to provide the last 10 questions also. I sought these in good Faith, and to prove it. I'm asking that this court to provide Probono Counsel so plaintiff can assure the requested information is safe guarded. Your Honor, my legal mail has been opened over 50 times in 4 years out of my presence. My legal property has been looted and destroyed by custody several times also. In closing im asking that the defense be forced to answer the last ten questions. And that Probono Counsel be provided to safeguard confidential info of defendant's throughout.

Sincerely,
Ivan G. McKinney

I certify the foregoing is true to the best of my ability. And if false I could be subjected to criminal/civil Penalties.

CC:

Hon.
Judge
McNulty

Leonard
Seaman/ESR

United States District Court
For The District Of New Jersey

Ivan G. McKinney
plaintiff,

v.

Nurse Cuccinella, Officer Joseph
Savino (i/p/a "OFF. Savino") et al.

Docket No.: 2:15-cv-
07442 (KM)(MAH)

Civil Action
Fed R. Civ. P. 26
Disclosures on behalf
of Defendant, Officer
Joseph Savino (i/p/a
"OFF. Savino")
2:15-cv-07442

TO: Mr. Leonard Seaman, ESQ.
250 Moonachie Road,
Suite 102
Moonachie, N.J. 07074

11-24-17

Sir:

Pro Se, Plaintiff, Ivan G. McKinney Provides the
following by way of initial disclosures pursuant to
FRCP 26:

A. The name and Of each individual likely to have
discoverable information that the disclosing party
may use to support its claim or defenses, unless
solely for impeachment, identifying the subjects
of the information;

1. Marcus Cook, Melony Cook, Peter McKinney,
Fred McKinney, Elizabeth McKinney, Gladys
McKinney, Radeel McKinney, Keishawania T., Jose
Doe, Jeffrey Steinfeld ESQ., Barbara Jean McKinney
Pro se Plaintiff Reserves the right to add persons
in the future if appropriate

(B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment;

1. Audio recording of proceedings before the Hon. James E. Guida on July 25, 2013 in State v. McKinney

2. Video recording of proceeding before the Hon. James E. Guida on July 25, 2013 in State v. McKinney

3. All camera footage in the elevator on the floor of Judge Guida's court on that day 07-25-13

4. All camera footage of the whole elevator ride to the basement 07-25-13 that MR McKinney was taken on

5. All camera footage on the floor the court Room was on 07-25-13

6. All camera Footage in the basement to bull/pen of the Court 07-25-13

7. All Police reports/incident reports written on the matter 07-25-13. And any written on days after regarding the incident.

8. All Police Radio transmissions ^{to and} from OFF. Savino, OFF. John Doe, Corp John Doe, and any and all transmissions from any and all officers on 07-25-13 in The Superior Court of Bergen

9. Any and all emails sent to and From OFF. Savino on 07-25-13 until 07-30-13. Including social media postings.
10. Any and all Text messages sent to and From OFF. Savino on 07-25-13 until 07-30-13. Including all social media postings.
11. Any and all text messages sent to and from OFF. John Doe on 07-25-13 until 07-30-13. Including all social media postings.
12. Any and all ~~text~~ ^{Email} messages sent to and from OFF. John Doe on 07-25-13 until 07-30-13. Including all social media postings.
13. Any and all text messages and emails sent ~~to~~ ^{to and} From Off. Corp. John Doe on 07-25-13 until 07-30-13. Including all social media postings.
14. Any and all Letter's Written regarding the 07-25-13 incident by Hon. Judge James E. Guida. And any and all text message and Emails sent ~~to~~ ^{to and from} Hon. Judge Guida on 07-25-13 until 07-30-13 including social media postings.
15. Any and all letter's Written by Mr. David Calviello Asst Prosecutor, Regarding the 07-25-13 incident. And all text messages, Emails, social postings, sent to and From Mr. Calviello on 07-25-13 until 07-30-13.
16. Any and all letter's Written by Ms. Kathy Fantuzzi, Asst Prosecutor, on 07-25-13 Regarding the incident. And any and all text messages, Emails, and social media postings sent to and From Ms. Fantuzzi. FROM 07-25-13 - 07-30-13

17. Any and all reports written by Mr. Peter Criscuolo, Plaintiff, Parole officer from New Jersey State Parole. Mr. Criscuolo was present on 07-25-13 at plaintiff's sentencing. Plaintiff request any and all text messages, Emails, social media postings, sent to and from Mr. Criscuolo ON 07-25-13 until 07-30-13

18. Any and all reports written by Lt. Russo of the New Jersey state Parole. On 07-25-13 Regarding the incident in the court, Plaintiff request all text messages, emails, social media postings, sent to and from Lt. Russo. From 07-25-13 until 07-30-13

19. All reports written by Ms. Maria Perez Rockful, Asst Prosecutor, on 07-25-13 regarding the incident. And any and all Emails, text messages, social media postings, sent to and from Ms. Rockful, from 07-25-13 until 07-30-13

20. Any and all text messages, ^{To and From} Emails, Social ~~media~~ postings, of Mary K. Miraglia c/o Hackensack/Daily Voice. ON 07-25-13 through 07-30-13

21. Any and all text messages, ^{To and From} Emails, Social media postings, of Jerry De Marco C/o Hackensack/Daily Voice, On 07-25-13 through 07-30-13

22. Any and all text messages, ^{To and From} ~~Berge's~~ Sheriff's Emails, Social media postings of all officer's working in Hon. Judge Guida's court. And Reports, 07-25-13 through 07-30-13

23. Any and all text messages, ^{TO and From} Emails, Social media postings, of all ^{Bergen County} officers working in the courthouse on 07-25-13 through 07-30-13

24. And any and all text messages, ^{TO and From} Emails, Social media postings, of all public officials present in that courtroom 07-25-13. As they are identified. From 07-25-13 07-30-13

25. Any and all text messages, Emails, Social media postings, of Lara Weisman, Hon. Judge Guida's clerk at the time of sentencing on 07-25-13. Any and ~~All~~ to and From Lara Weisman. From 07-25-13 Through 07-30-13. I believe this is the correct spelling of her ~~to~~ last name

26. Any and all text messages, Emails, Social Media Postings, of all Bergen County Prosecutor's employees, Bergen County Sheriff's employees, ^{and} Bergen County Public Defender's employees. ~~From~~ The dates of 07-25-13 until 07-30-13. Any and all to and from those officials

27. Any and all text messages, Emails, Social media postings, of Hon. Judge James E Guida's Court Manager ^{and} Clerk Dana Arcada. All these messages to and from Ms. Arcada on 07-25-13 ~~and~~ through 07-30-13.

Plaintiff, Ivan McKinney will rely on the enclosed mentioned information.

Plaintiff, does not have all this information in his possession, but will seek this information through discovery. In the alternative settlement resolve transpires.

Respectfully submitted,

Dated 11-24-17

~~The Plaintiff~~

Ivan McKinney
#601321
PROSE Litigant
NJSP
P.O. BOX 861
Trenton, NJ 08625

By Ivan McKinney

(6)

Interrogatorie Answers

McKinney v.
Cuccinella et al.
2:15-cv-
07442(KM)(MAH)

Answer 1. Marcus Cook, Melony Cook, Peter McKinney, Fred McKinney, Elizabeth McKinney, Gladys McKinney, Radeel McKinney, Keishawnja T., Jose Doe, Jeffrey Steinfeld ESQ, And other public Officials

Answer 2. Gladys McKinney: Exspressed to Mr. Steinfeld and all other family member's what she saw. She was coming out the lady's room, and the cop's was assaulting this plaintiff. And she shouted stop hitting my brother please

Answer 3. N/A

Answer 4. All Camera's in Hon. Judge James E. Guida's Court. And all camera's in the hallway on that floor. And the elevator and all camera's leading from the floor of the court to the basement bullpens

Answer 5. Not sure, if any expert needs to be called. But plaintiff preserves the Right

Answer 6. 42 U.S.C. 1983

Answer 7. Any^{and} all documents that are relevant!

Answer 8. The officer's should not have used excessive force on plaintiff. Should not have stopped plaintiff from exercising his 1st Amendment Right. And the Judge should have requested the removal.

①

Answer

9. A. Failed to refrain from excessive force.
 B. Removed plaintiff from his ^{exercising} 1st Amendment speech. C. Removed plaintiff from court without the Judge's leading to do so

Answer

10. On 07-25-13 I was being sentenced in James Guida's Court in Bergen County. The Judge allowed me to speak and I chose my statement. Officer's forcefully removed me from court beat in the hallway. Slammed my head in the elevator and beat me all the way to the basement bullpen

Answer

11. I still have headaches and Neck Pain

Answer

12. Headaches and neck pain

Answer

13. N/A

Answer

14. don't recall dates if any

Answer

15. Bergen County Jail medical Dept.

~~Answer~~

16. N/A

Answer

17. N/A

Answer

18. N/A

Answer 19. N/A

Answer 20. N/A

Answer 21. Does not have in my possession

Answer 22. See #1

Answer 23. N/A

Answer 24. N/A

Answer 25. 42 U.S.C. 1983

Dated
11-24-17

Respectfully Submitted,
Ivan McKinney

Ivan G. McKinney #601361

N.J. S.P.

P.D. Box 861

Trenton, N.J. 08625

John 3.76
Legal-Mail

U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
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United States District Court
New Jersey District

Attn. Clerks Office

50 Walnut Street

Newark, N.J. 07101

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